

Mr. Donald Williams  
SBCC  
1 Harvard Road  
P.O. Box 8000  
Shirley, Ma. 01464

C. Raye Poole, Esq.  
Department of Correction  
Legal Division  
70 Franklin Street, Suite 6600  
Boston, Ma. 02110-1327

Dated:

Re: Williams, et al. v. Spencer, et al.,  
U.S.D.C. No. 13-cv-10083-FDS


Dear Mrs. Poole:

Enclosed please find the following:

1. Plaintiffs First Request For Production of Documents and ~~Things~~, with an affixed certificate of service.
2. Plaintiffs' First Set of Interrogatories for Bruce Gelb, Superintendent, with an affixed certificate of service.
3. These discovery requests are being submitted in good-faith and should be answered to within 30 days.

Thank you for your attention and cooperation in this matter.

Sincerely,

  
Donald Williams, pro se

Enclosures

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Shekeira Williams, et al.,

Plaintiffs,

Civil Action  
No. 13-10083-FDS

v.

Luis S. Spencer, et al.,

Defendants.

PLAINTIFFS SHEKEIRA WILLIAMS AND DONALD WILLIAMS'  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND  
THINGS

Now comes the plaintiffs in the above-entitled civil action, moves pursuant to Fed. R. Civ. P. 34(a), makes a good-faith request upon defendant, Luis S. Spencer, to provide them with the below requested documents in relation to the events on June 3, 2012 where Mrs. Williams was accused of introducing contraband to the facility and was subsequently barred from visiting her husband for one year. The plaintiffs seeks the following documents to be provided to them:

1. Any incident reports written, and computer screen report(s) filed by staff member(s),

2. Any and all photographs taken by the Department of Corrections of the alleged scene where the contraband was found, photographs of the contraband item(s) found, and any photographs taken of Mrs. Williams and any person(s) alleged to be involved.

3. The Plaintiffs want to view all video and audio evidence that may be in the possession of the Department of Correction involving this matter, including but not limited to, video(s) of the visiting area when Mrs. Williams and the other woman arrived in the SMU visiting area, any video(s) of interrogation of Mrs. Williams, and any search of Mrs. Williams and her car.

4. Any documents from the State Police, who were a part of the investigation, and any findings by the State Police, or Shirley Police Department in regards to this matter.

5. Any notices provided to Mr. and Mrs. Williams in regards to the barring of Mrs. Williams, and any notices, court summons provided to Mrs. Williams alleging criminal conduct by her on June 3, 2012.

6. Any disciplinary report(s) written against Mr. Williams in regards to the alleged incident of June 3, 2091.

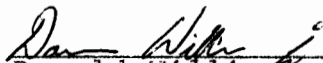
7. Any fingerprint evidence that may be in the possession of the Department of Corecion ppoof of possession of the contraband te(s) found in the non-contact visiting area of the SMU where Mrs. Williams visited that day in question.

8. Copies of any complaint lodged against Mrs. Williams in regards to this incident by the Department of Correction, and/or police.

9. Any test results from the contraband found on June 3, 2012 in the non-contact area of the visiting room in the SMU at SBCC..

10. Any investigative report(s) filed and any and all conclusions from the investigation.

Respectfully Submitted,

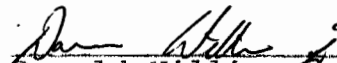


Donald Williams, pro se  
SBCC  
P.O. Box 8000  
Shirley, Ma. 014643

Dated:

CERTIFICATE OF SERVICE

I, Donald Williams, certify that I caused a copy to be served upon, C. Raye Poole, Esq., Department of Correction, Legal Division, 70 Franklin Street, Suite 600, Boston, Ma. 02110-1327, by first class mail, postage prepaid.



Donald Williams, pro se

Dated:

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Shekeira Williams, et al.,

Plaintiffs,

Civil Action

No. 13-10083-FDS

v.

Luis S. Spencer, et al.,

Defendants.

PLAINTIFFS' FIRST SET OF INTERROGATORIES

Now comes the plaintiffs, submit~~s~~ their first set of interrogatories to be answered by Bruce Gelb, Superintendent, pursuant to Fed. R. Civ. P. 30(a)-(c), under the pains and penalties of perjury. The defendant has 30 days to answer the following interrogatories.

1. State your name, age, educational background, and employment history?
2. State your present occupation, how long you worked in your present occupation, your job title, and job function?
3. Were you notified by prison staff on June 3, 2012 when contraband was found in the SMU area of the prison? If so, please state how you were notified, and who notified you?
4. Did you come to the facility after you were notified, or did you wait to be briefed the next day by staff?
5. What was your ~~rea~~soning for pinpointing Mrs. Williams to be barred instead of the other woman who was also in the visiting area at the time?

-2-


6. What is the policy in barring a civilian from entering the prison to visit with loved ones?

7. Were you aware that Mrs. Williams cooperated with staff and allowed them to search her and her car? If so, what was you told?

8. Have you ever had any problems with Mrs. Williams in the past when she visited at your facility? If your answer is yes, please state the events.

All answers to these interrogatories must be provided under the pains and penalties perjury.

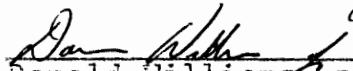
Respectfully Submitted,

  
Donald Williams, pro se  
SBCC  
P.O. Box 8000  
Shirley, Ma. 01464

Dated:

CERTIFICATE OF SERVICE

I, Donald Williams, certify that I caused a true copy to be served upon, Richard E. Gordon, Esq., Department of Correction, Legal Division, 70 Franklin Street, Suite 600, Boston, Ma. 02110-1327, by first class mail, postage prepaid.

  
Donald Williams, pro se

Dated: